

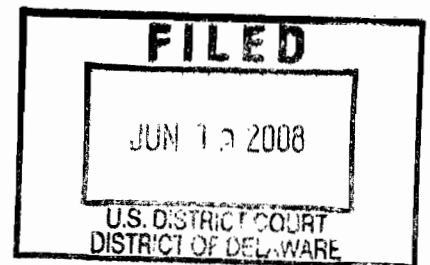
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ADAM WEIZKE  
PLAINTIFF

v

CORRECTIONAL MEDICAL  
SERVICES, ET AL,  
DEFENDANTS

CASE No. 007-504-SLR



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PLAINTIFF'S MOTION FOR REQUEST OF DISCOVERY

Comes now, PLAINTIFF'S MOTION FOR REQUEST OF SPECIFIC  
DISCOVERABLE INFORMATION RELATIVE TO THE  
ABOVE MENTIONED CASE IN QUESTION.

- i) THE NAME AND, IF KNOWN, THE ADDRESS AND TELEPHONE NUMBER OF EACH INDIVIDUAL LIKELY TO HAVE DISCOVERABLE INFORMATION THAT THE DISCLOSING PARTY MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES, UNLESS SOLELY FOR IMPEACHMENT, IDENTIFYING THE SUBJECTS OF THE INFORMATION;

- 2) A COPY OF, OR A DESCRIPTION BY CATEGORY AND LOCATION OF, ALL DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS THAT ARE IN THE POSSESSION, CUSTODY, OR CONTROL OF THE PARTY AND THAT THE DISCLOSING PARTY MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES, UNLESS SOLELY FOR IMPEACHMENT;
- 3) A COMPUTATION OF ANY CATEGORY OF DAMAGES CLAIMED BY THE DISCLOSING PARTY, MAKING AVAILABLE FOR INSPECTION AND COPYING AS UNDER RULE 34 THE DOCUMENTS OR OTHER EVIDENTIARY MATERIAL, NOT PRIVILEGED OR PROTECTED FROM DISCLOSURE, ON WHICH SUCH COMPUTATION IS BASED, INCLUDING MATERIALS BEARING ON THE NATURE AND EXTENT OF INJURIES SUFFERED; AND
- 4) FOR INSPECTION AND COPYING AS UNDER RULE 34 ANY INSURANCE AGREEMENT UNDER WHICH ANY PERSON CARRYING ON AN INSURANCE BUSINESS MAY BE LIABLE TO SATISFY PART OR ALL OF A JUDGMENT WHICH MAY BE ENTERED IN THE ACTION OR TO INDEMNIFY OR REIMBURSE FOR PAYMENTS MADE TO SATISFY THE JUDGMENT.
- 5) THE ADDRESS'S FOR DR. RALPH SMITH AND DR. TADEO WHO WORKED AT H R V C. I DURING MY INCARCERATION THERE, FROM FEB 24, 2005 THROUGH SEPT 11, 2007.

- 6) THE NAME OF THE MEDICAL DIRECTOR AT H.R.Y.C.I DURING FEB. OF 2005 THROUGH SEPT. OF 2007
- 7) PLAINTIFF'S ENTIRE MEDICAL RECORD FROM MAY OF 2004 UNTIL PRESENT DATE, INCLUDING ALL BLOOD TESTS, ULTRA SOUND REPORTS, PRELIMINARY REPORTS, TEST RESULTS, NOTES OR TREATMENT OPTIONS CONCERNING MY MEDICAL SITUATION FROM ALL DOCTOR'S, NURSE'S, PHYSICIAN'S ASSISTANCE, MEDICAL DIRECTOR, FRANCISE J SHANNE THE UROLOGIST, AND ULTRA SOUND TECHNICIANS.
- 8) DEPARTMENT OF CORRECTIONS RULES AND PROCEDURES CONCERNING MEDICAL PROCEDURES.
- 9) CORRECTIONAL MEDICAL SERVICES (C.M.S) HEALTH SERVICE Policy AND PROCEDURES MANUAL ALONG WITH C.M.S'S Policy OR CUSTOM CONCERNING SICK CALL AND MEDICAL GRIEVANCE & WINNING THE APPEAL PROCESS.
- 10) TO BE ABLE TO VIEW AND COPY THE AMERICAN MEDICAL ASSOCIATIONS "STANDARDS FOR HEALTH SERVICES IN PRISONS".
- 11) WOULD LIKE TO READ A COPY OF THE CONTRACT AGREEMENT BETWEEN THE DEPARTMENT OF CORRECTIONS (DOC) AND CORRECTIONAL MEDICAL SERVICES INC. (C.M.S) CONCERNING MY MEDICAL CARE AND TREATMENT.

WHEREFORE, PLAINTIFF REQUEST THE FOREGOING ITEMS  
TO BE REVEALED AT THE EARLIEST POSSIBLE CONVENIENCE.

JUNE 18, 2008  
[DATE]

ADAM WENZKE #182595  
D.C.C. Bldg #23  
1181 PADDOCK RD.  
SMYRNA, DEL 1977

## CERTIFICATE OF SERVICE

I ADAM WENZKE, HEREBY CERTIFY THAT I  
HAVE SERVED A TRUE AND CORRECT COPY(IES) OF THE ATTACH-  
ED: NOTICE OF MOTION, AND PLAINTIFF'S MOTION FOR  
REQUEST OF DISCOVERY UPON THE FOLLOWING PARTIES.

DEPARTMENT OF JUSTICE  
STATE OFFICE BUILDING  
MRS OPHELIA M WATERS  
820 N. FRENCH ST.  
WILM, DE 19801 - 3509

OFFICE OF THE CLERK  
U.S. DISTRICT COURT  
844 N KING ST.  
(LOCK BOX 18)  
WILM DE 19801-3570

By PLACING SAME IN A SEALED ENVELOPE, AND  
DEPOSITING SAME IN THE UNITED STATES MAIL AT THE  
DELAWARE CORRECTIONAL CENTER, SMYRNA, DE. 19977

ON THIS 18<sup>th</sup> DAY OF JUNE 2008.

Adam Wenzke

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ADAM WENZKE  
Plaintiff

v

CORRECTIONAL MEDICAL  
SERVICES ET, AL  
Defendants

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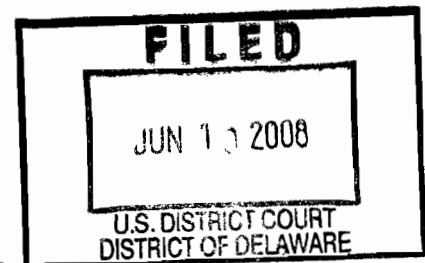
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CASE NO. 007-504-SLR



NOTICE OF MOTION

PLEASE TAKE NOTICE, THAT THE ENCLOSED MOTION FOR  
DISCOVERY WILL BE PRESENTED TO THIS HONORABLE COURT  
AT THE EARLIEST POSSIBLE CONVENIENCE.

JUNE 18, 2008  
[DATE]

ADAM WENZKE #182515  
D.C.C. Bldg. #23  
1181 PADDOCK ROAD  
SMYRNA, DE 19977

WM: ADAM WENZKE  
SBI# 182595 UNIT #23  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977



OFFICE OF THE CLERK  
U.S. DISTRICT COURT  
844 N. KING STREET (LOCK BOX 18)  
Wilm. DE.  
19801-3570

LEGAL MAIL

